

ORIGINAL
(Red)

Stauffer Chemical Company

P. O. BOX 0852
WESTPORT, CT 06881-0852

September 8, 1986

Galina Bendersky
841 Chestnut Building
Philadelphia, Penn. 19107

Re: Comments on U.S. EPA and Delaware DNREC
Perferred Remedial Alternatives
Delaware City PVC Site

Dear Ms. Bendersky:

Stauffer Chemical Company has reviewed the EPA and DNREC Fact Sheet for the subject site, which provided public notice of EPA and DNREC Perferred Alternatives. The following comments on the remedial alternatives are presented for your consideration in finalizing the Record of Decision.

1. Regarding remediation of the ground water, we concur with the EPA/DNREC perferred option. We believe the proposed groundwater capture system and the use of the collected water in Formosa's process and treatment system represents the most environmentally sound and cost effective approach to remediating the identified ground water contamination. It also achieves the Superfund goals identified in the EPA/DNREC Fact Sheet.
2. Regarding the remediation of the Closed Buried Sludge Pits and the Former PVC Storage Area, we do not concur with the EPA/DNREC selection of perferred options. The EPA/DNREC options for these sources consist of providing a double synthetic membrane cover. As this approach to remediation is substantially more costly and not materially more environmentally effective than that proposed in the Feasibility Study, we do not believe that this approach to remediation meets the cost effectiveness goals of Superfund.

The Closed buried Sludge Pits were closed with a synthetic membrane and soil cover in 1979. We believe that the existing closure meets the Superfund goals identified in the EPA and DNREC Fact Sheet and the option recommended in the Feasibility Study of maintaining the existing closure's integrity is cost effective.

AR300635

RECEIVED

SEP 10 1986

321.1.1.1
Region 1

SUBSIDIARY OF Chesebrough-Pond's Inc.

ORIGINAL
(4)

With the exception of two identified areas, the Former PVC Storage Area has been shown by the results of the Feasibility Study to be an insignificant source. The option proposed by the Feasibility Study to provide a synthetic membrane cap over the two areas of high contaminate concentrations meets the Superfund goals identified in the EPA/DNERC Fact Sheet and is cost effective.

Furthermore, if EPA/DNERC are insistent on a double liner closure for these identified sources, we believe that consideration should be given to the use of a soil member having equivalent permeability characteristics as one of the two synthetic membranes members proposed by EPA/DNERC.

Very truly yours,

STAUFFER CHEMICAL COMPANY

Bruce S. McClellan L.H.

Bruce S. McClellan
Senior Hydrogeologist

BSM:lh

AR300636